

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

John Knox Moore : Case No. 22-12626-pmm
Trescebel Moore
Debtor(s)

ANSWER TO MOTION OF RELIEF FROM THE AUTOMATIC STAY OF
PENNYMAC LOAN SERVICES, LLC
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The Debtor paid the account up to date by phone on June 30, 2023.
7. Denied that the same is appropriate as the Debtors paid the account up to date on June 30, 2023.
8. Denied.
9. Denied.
10. Denied that the Debtors are in arrears. There should be no fees or costs.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen
David M. Offen Esquire
Attorney for Debtor

Dated: July 10, 2023

A copy of this Answer is being served on MICHAEL PATRICK FARRINGTON, Esquire and the Chapter 13 Trustee.